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24 **UNITED STATES DISTRICT COURT**

25 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

26 RETIREE SUPPORT GROUP OF
27 CONTRA COSTA COUNTY,

28 **No. C12-00944 (JSW)**

29 Plaintiff,

30 v.
31 **JOINT STIPULATION TO EXTEND CASE
32 MANAGEMENT CONFERENCE AND
33 [PROPOSED] ORDER
34 (N.D. Local Rule 6-1(a))**

35 CONTRA COSTA COUNTY,

36 Defendant.

1 WHEREAS, pursuant to the Court's Order of March 7, 2012, Defendant Contra Costa
 2 County ("County" or "Defendant") and Plaintiff Retiree Support Group of Contra Costa County
 3 ("Plaintiff") (together, "the Parties") are calendared to appear for an Initial Case Management
 4 Conference ("CMC") on June 15, 2012 (Dkt. 8);

5 WHEREAS, Defendant filed a Motion to Dismiss the Amended Complaint (the "Motion to
 6 Dismiss") on April 30, 2012 (Dkt. 15);

7 WHEREAS, the Parties filed a joint stipulation requesting a modification of the briefing
 8 schedule for the Motion to Dismiss (Dkt 20);

9 WHEREAS, this Court found good cause to grant the Parties' Amended Stipulation to
 10 Extend Briefing Schedule based on the declarations of Jeffrey Lewis and Raymond F. Lynch, lead
 11 counsel in this matter, and on May 8, 2012, ordered a modified briefing schedule that extended the
 12 deadline for the filing of Plaintiff's Opposition to May 23, 2012 and for Defendant's Reply brief to
 13 June 6, 2012 (Dkt. 22);

14 WHEREAS, on May 10, 2012, the Court *sua sponte* changed the hearing date for the
 15 Motion to Dismiss to July 13, 2012 (Dkt. 23);

16 WHEREAS, pursuant to the Court Order of March 7, 2012, the Parties must hold their
 17 meet and confer session regarding initial disclosures, early settlement, alternate dispute resolution
 18 process selection and the creation of a discover plan by May 25, 2012 (Dkt. 8);

19 WHEREAS, on June 8, 2012, the Parties must make their initial disclosures and file a Case
 20 Management Report with the Court (Dkt. 8);

21 WHEREAS, the CMC presently is scheduled on June 15, 2012, four (4) weeks before the
 22 hearing on the Motion to Dismiss the Complaint (Dkt 8);

23 WHEREAS, Jeffrey Lewis, lead counsel for Plaintiff, must prepare for and take multiple
 24 depositions in locations across the country in a complex financial case, and must also prepare for
 25 oral argument before the Ninth Circuit;

26 WHEREAS, Andrew Lah, the associate attorney who will be doing much of the work in
 27 preparing for the CMC, is engaged in complex negotiations, which are time sensitive;

28 WHEREAS, Raymond F. Lynch, lead counsel for Defendant, is involved in a writ of

1 mandate proceeding of which he became aware on May 6, 2012, which will require a significant
2 portion of his time. That opposition is due on June 6, 2012 and must also prepare for oral
3 argument before the Ninth Circuit;

4 WHEREAS, counsel Sarah D. Mott, who will perform much of the work preparing for the
5 CMC, will be out of the country on a long-planned vacation beginning May 26, 2012 and through
6 June 6, 2012.

7 WHEREAS, for reasons of judicial economy, there is good cause to extend the Case
8 Management Conference as set forth in the attached declarations of Raymond F. Lynch and
9 Andrew Lah.

10 NOW THEREFORE, the Parties, by and through their respective counsel of record, hereby
11 stipulate and agree as follows, and respectfully ask the Court to enter the terms of this stipulation
12 as its Order:

13 The Case Management Conference is rescheduled for 1:30 p.m. on July 15, 2012, or as
14 soon thereafter as the matter may be heard, and all associated deadlines shall be in accordance
15 with FRCP 26(f) and (d), ADR Local Rule 3-5, Civil L.R. 16 and Standing Order No. 5.

16 **IT IS SO STIPULATED** between the parties.

17 DATED: May 15, 2012

HANSON BRIDGETT LLP

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By: _____ /s/
RAYMOND F. LYNCH
Attorneys for Defendant
CONTRA COSTA COUNTY

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DATED: May 15, 2012
LEWIS, FEINBERG, LEE, RENAKER &
JACKSON, P.C.

By: _____ /s/
JEFFREY LEWS
Attorneys for Plaintiff
RETIREE SUPPORT GROUP OF CONTRA
COSTA COUNTY

ORDER

PURSUANT TO THE FOREGOING STIPULATION, ~~IT IS SO ORDERED.~~
the Court HEREBY CONTINUES the case management conference to August 10, 2012 at 1:30 p.m.

Dated: May 21, 2012


Hon. JEFFREY S. WHITE
United States Judge